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TRANSMITTAL OF APPEAL BRIEF (Large Entity)			Docket No. US010007/16455	
In Re Application Of: Daniel Relletier				
Serial No. 09/772,476		Filing Date January 30, 2001	Examiner Arthur A. Smith	Group Art Unit 2851
Invention: CAMERA SYSTEM FOR PROVIDING INSTANT SWITCHING BETWEEN WIDE ANGLE AND FULL RESOLUTION VIEWS OF A SUBJECT				
<p style="text-align: center;"><u>TO THE COMMISSIONER FOR PATENTS:</u></p> <p>Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on</p> <p>The fee for filing this Appeal Brief is: \$330.00</p> <p><input checked="" type="checkbox"/> A check in the amount of the fee is enclosed.</p> <p><input type="checkbox"/> The Director has already been authorized to charge fees in this application to a Deposit Account.</p> <p><input checked="" type="checkbox"/> The Director is hereby authorized to charge any fees which may be required, or credit any overpayment to Deposit Account No. 19-1013/SSMP</p> <div style="display: flex; justify-content: space-between; align-items: flex-end; margin-top: 20px;"><div style="text-align: center;"> _____ Signature</div><div style="text-align: right;">Dated: 12/8/2003</div></div> <div style="display: flex; justify-content: space-between; margin-top: 20px;"><div><p>Thomas Spinelli Registration No.: 39,533</p><p>SCULLY, SCOTT, MURPHY & PRESSER 40 GardenCity Paza Garden City, New York 11530 (516) 742-4343</p></div><div style="border: 1px solid black; padding: 5px; width: 300px;"><p>I certify that this document and fee is being deposited on 12/8/2003 with the U.S. Postal Service as first class mail under 37 C.F.R. 1.8 and is addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.</p><div style="text-align: center;"> _____ Thomas Spinelli</div></div></div> <div style="margin-top: 20px;">cc:</div>				



BRIEF ON APPEAL

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Thomas Spinelli
Attorney for Appellant
Registration No. 39,533

SCULLY SCOTT MURPHY & PRESSER
400 Garden City Plaza
Garden City, New York 11530
(516) 742-4343



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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

Applicant: Daniel Pelletier Art Unit: 2851
Serial No.: 09/772,476 Examiner: Arthur A. Smith
Filed: January 30, 2001 Docket: US010007 (16455)
For: CAMERA SYSTEM FOR Dated: December 8, 2003
 PROVIDING INSTANT
 SWITCHING BETWEEN WIDE
 ANGLE AND FULL RESOLUTION
 VIEWS OF A SUBJECT

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

BRIEF ON APPEAL

Sir:

I. INTRODUCTION

Pursuant to the provisions of 35 U.S.C. §§ 134 and 37 C.F.R. §§ 1.191 and 1.192, this paper is submitted as a brief setting forth the authorities and arguments upon which Appellants rely in support of the appeal from the Final Rejection of Claims 1-5, 7, 9, and 10 in the above-identified patent application on July 8, 2003.

II. REAL PARTY OF INTEREST

The real party of interest in the above-identified patent application is U.S. Philips Electronics.

III. RELATED APPEALS AND INTERFERENCES

Appellants respectfully submit that the present application is involved in no other appeal or interference besides the present Appeal.

IV. STATUS OF THE CLAIMS

The parent application, U.S. patent application Serial No. 09/772,476 was filed on January 30, 2001, originally included Claims 1-10.

In an Official Action dated January 24, 2003, the Examiner rejected claims 1 and 3-10 under 35 U.S.C. § 102(b) as being anticipated by World Patent No. WO 99/455511 to Nayar et al., (hereinafter "Nayar").

In a Response under 37 C.F.R. § 1.111, filed April 17, 2003, Applicants argued that Nayar does not disclose or suggest "the processor includes means for receiving calibration data that defines particular operational characteristics of the stationary and controlled cameras" as was recited in original claim 6. Furthermore, Applicants argued that Nayar does not disclose or suggest "the step of providing calibration data that defines particular operational characteristics of the stationary and remotely controllable cameras" as was recited in original claim 8. Therefore, independent claims 1 and 7 were amended by adding the features of claims 6 and 8, respectively. Consequently, claims 6 and 8 were canceled.

In the Final Official Action, issued July 8, 2003, the Examiner reiterated the rejection of claims 1-5, 7, 9 and 10 as being anticipated by Nayar. Consequently, Claims 1-5, 7, 9 and 10 are the claims on appeal. A copy of the rejected claims is attached hereto in the Appendix.

V. STATUS OF THE AMENDMENTS

Appellants have not filed any amendments subsequent to the issuance of the Final Rejection of July 8, 2003.

VI. SUMMARY OF THE INVENTION

The present invention relates to a camera system having a stationary camera with a wide angle view and a remotely controllable camera with a relatively smaller angle view for providing images in substantially full resolution. A processor monitors the wide angle view of the stationary camera to enable selection of a desired subject within the wide angle view and generates an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera. The processor further controls the remotely controllable camera to provide a view that overlaps the electronic pan-tilt-zoom view of the desired subject and processes the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely

controllable camera. The processor further includes means for receiving calibration data that defines particular operational characteristics of the stationary and remotely controlled cameras. The present invention further relates to methods for operating the above camera system.

The specification, from page 3, line 14 to page 7, line 7 discusses illustrative embodiments of the present invention in detail.

VII. THE APPEALED CLAIMS

Claims 1-5, 7, 9, and 10 are on appeal before the Board of Patent Appeals and Interferences, with Claims 1 and 7 being the independent claims. Independent Claim 1 is directed to a camera system comprising: a stationary camera having a wide angle view; a remotely controllable camera having a relatively smaller angle view for providing images in substantially full resolution; and a processor for monitoring the wide angle view of the stationary camera, enabling selection of a desired subject within the wide angle view, generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera, controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject, and processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution

of the remotely controllable camera, the processor further including means for receiving calibration data that defines particular operational characteristics of the stationary and remotely controlled cameras. Claims 2-5 directly or indirectly depend upon Claim 1 and further limit the scope of Claim 1.

Claim 7 is directed to a method of operating a camera system comprising the steps of: providing a camera system having a stationary camera providing a wide angle view and a remotely controllable camera set having a relatively smaller angle view for providing images in substantially full resolution; monitoring the wide angle view of the stationary camera; selecting a desired subject within the wide angle view; generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera; controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject; processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely controllable camera; and providing calibration data that defines particular operational characteristics of the stationary and remotely controllable cameras.

Dependent Claims 9 and 10 directly or indirectly depend upon Claim 7 and further limit the scope of Claim 7.

Each of the appealed claims, mentioned supra, is set forth in the Appendix.

VIII. THE PRIOR ART RELIED UPON

The reference relied upon by the Examiner in rejecting Claims 1-5, 7, 9, and 10 is World Patent No. WO 99/455511 to Nayar et al., (hereinafter "Nayar").

IX. THE ISSUES

The issue raised in the Final Rejection dated July 8, 2003 remaining for resolution is are Claims 1-5, 7, 9, and 10 on appeal patentable, under 35 U.S.C. § 102(b), in light of Nayar.

X. THE REFERENCE

Nayar discloses a combined wide angle and narrow angle imaging system and method for surveillance and monitoring. At page 11, lines 27-29 of Nayar, the same teaches that the coordinate mapping system provides pan, tilt, and zoom settings to the camera. Nayar discloses at page 13, lines 5-11 that in systems with more than one PTZ camera, it is necessary to make assumptions regarding the distance of the objects from the cameras.

XI. GROUPING OF THE CLAIMS

The prior art rejections of issue herein apply to more than one claim. Despite this, Appellant submits that the rejected claims stand or fall together.

XII. APPELLANT'S ARGUMENTS

The rejection of Claims 1-5, 7, 9, and 10, on appeal, under 35 U.S.C. § 102(b), as being allegedly anticipated by Nayar is improper.

In the Final Rejection, Claims 1-5, 7, 9, and 10 of the instant application were rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by Nayar.

As discussed above, in response to the Official Action of January 24, independent claims 1 and 7 were amended to recite the features of claims 6 and 8, respectively. In addition, Applicants argued that Nayar does not disclose or suggest "the processor includes means for receiving calibration data that defines particular operational characteristics of th stationary and controlled cameras."

In the Final Rejection, the Examiner argued that Nayar discloses such a feature at page 11, lines 27-29 in that the pan, tilt, and zoom settings can be interpreted as calibration data since the camera must be moved to a specific location by a specific command. The Examiner further argued that Sergeant et al. (US 5,627,616), whose teachings are

incorporated by reference into Nayar, discloses a controlled camera system that is provided with calibration data (citing column 9, lines 10-32).

Applicants again disagree with the Examiner's reading of the Nayar and Sergeant et al. references.

Nayar discloses at page 11, lines 27-29 that the coordinate mapping system 70 provides appropriate pan, tilt, and zoom settings to the PTZ system 20, so that the PTZ system is directed to view the region of interest. Thus, the pan, zoom, and tilt settings are a control signal supplied to the PTZ camera to control the same to direct it to view a particular object of interest. This is in stark contrast to the calibration data as recited in claims 1 and 7.

Page 5, lines 12-17 of the present application discuss a preferred embodiment of the present invention in which the processor is programmed with software that realizes optical flow techniques that allow the camera system 10 to align the views from the stationary 12 and mechanical camera 14. In this context, the specification discusses the processor including means for receiving calibration data that defines particular operational characteristics of the camera 12, 14. Thus, the calibration data is defined in the specification and the claims as defining operational characteristics of the cameras, for example, for use in aligning the views of the

cameras using the optical flow techniques. In this context, the operational characteristics of the cameras cannot be considered the control signals for operating the cameras. The signals described in Nayar merely control the camera's motors to direct the camera accordingly; they in no way define operational characteristics of the cameras.

Furthermore, the recited portion of Sergeant et al., discloses a mechanical stop mounted in the camera itself to recognize a home position of the camera. This configuration does not disclose receiving calibration data defining operational characteristics of the camera.

Therefore, based on the above arguments and remarks, Appellants respectfully submit that the claims of the instant invention on appeal are not anticipated by Nayar. Consequently, the rejection of the claims based on the Nayar reference is in error.

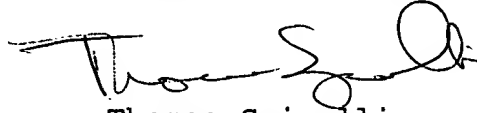
XIII. CONCLUSION

In view of the remarks submitted hereinabove, the reference applied against Claims 1-5, 7, 9, and 10 on appeal do not render those claims unpatentable under 35 U.S.C. § 102(b). Thus, Appellants submit that the § 102(b) rejection is in error and must be reversed.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment in connection

herewith to Deposit Account No. 19-1013/SSMP. A triplicate
copy of this sheet is enclosed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Spinelli", with a stylized flourish at the end.

Thomas Spinelli
Registration. No. 39,533

SCULLY SCOTT MURPHY & PRESSER
400 Garden City Plaza
Garden City, New York 11530
(516) 742-4343
TS/cm

APPENDIX

CLAIMS ON APPEAL: CLAIMS 1-5, 7, 9 and 10
Application Serial No. 09/772,476

1. (Previously Presented) A camera system, the system comprising:

a stationary camera having a wide angle view;

a remotely controllable camera having a relatively smaller angle view for providing images in substantially full resolution; and

a processor for monitoring the wide angle view of the stationary camera, enabling selection of a desired subject within the wide angle view, generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera, controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject, and processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely controllable camera, the processor further including means for receiving calibration data that defines particular operational characteristics of the stationary and remotely controlled cameras.

2. (Original) The camera system according to claim 1 wherein the stationary camera comprises a electronic-pan-tilt-zoom camera.

3. (Original) The camera system according to claim 1 wherein the remotely controlled camera comprises a mechanical-pan-tilt-zoom camera.

4. (Original) The camera system according to claim 1 wherein the processor comprises a computer.

5. (Original) The camera system according to claim 1 further including means for displaying the substantially full resolution view of the desired subject.

6. (Canceled)

7. (Previously Presented) A method of operating a camera system, comprising the steps of:

providing a camera system having a stationary camera providing a wide angle view and a remotely controllable camera set having a relatively smaller angle view for providing images in substantially full resolution;

monitoring the wide angle view of the stationary camera;

selecting a desired subject within the wide angle view;

generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera;

controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject;

processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely controllable camera; and

providing calibration data that defines particular operational characteristics of the stationary and remotely controllable cameras.

8. (Canceled)

9. (Original) The method according to claim 7 wherein the processing step further comprises the step of displaying the processed view of the desired subject.

10. (Original) The method according to claim 7 wherein the selecting step comprises the step of generating pixel data defining the desired subject within the wide angle view.



BRIEF ON APPEAL

Thomas Spinelli
Attorney for Appellant
Registration No. 39,533

SCULLY SCOTT MURPHY & PRESSER
400 Garden City Plaza
Garden City, New York 11530
(516) 742-4343



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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

Applicant:	Daniel Pelletier	Art Unit:	2851
Serial No.:	09/772,476	Examiner:	Arthur A. Smith
Filed:	January 30, 2001	Docket:	US010007 (16455)
For:	CAMERA SYSTEM FOR PROVIDING INSTANT SWITCHING BETWEEN WIDE ANGLE AND FULL RESOLUTION VIEWS OF A SUBJECT		
		Dated:	December 8, 2003

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

BRIEF ON APPEAL

Sir:

I. INTRODUCTION

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In the Final Official Action, issued July 8, 2003, the Examiner reiterated the rejection of claims 1-5, 7, 9 and 10 as being anticipated by Nayar. Consequently, Claims 1-5, 7, 9 and 10 are the claims on appeal. A copy of the rejected claims is attached hereto in the Appendix.

V. STATUS OF THE AMENDMENTS

Appellants have not filed any amendments subsequent to the issuance of the Final Rejection of July 8, 2003.

VI. SUMMARY OF THE INVENTION

The present invention relates to a camera system having a stationary camera with a wide angle view and a remotely controllable camera with a relatively smaller angle view for providing images in substantially full resolution. A processor monitors the wide angle view of the stationary camera to enable selection of a desired subject within the wide angle view and generates an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera. The processor further controls the remotely controllable camera to provide a view that overlaps the electronic pan-tilt-zoom view of the desired subject and processes the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely

controllable camera. The processor further includes means for receiving calibration data that defines particular operational characteristics of the stationary and remotely controlled cameras. The present invention further relates to methods for operating the above camera system.

The specification, from page 3, line 14 to page 7, line 7 discusses illustrative embodiments of the present invention in detail.

VII. THE APPEALED CLAIMS

Claims 1-5, 7, 9, and 10 are on appeal before the Board of Patent Appeals and Interferences, with Claims 1 and 7 being the independent claims. Independent Claim 1 is directed to a camera system comprising: a stationary camera having a wide angle view; a remotely controllable camera having a relatively smaller angle view for providing images in substantially full resolution; and a processor for monitoring the wide angle view of the stationary camera, enabling selection of a desired subject within the wide angle view, generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera, controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject, and processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution

of the remotely controllable camera, the processor further including means for receiving calibration data that defines particular operational characteristics of the stationary and remotely controlled cameras. Claims 2-5 directly or indirectly depend upon Claim 1 and further limit the scope of Claim 1.

Claim 7 is directed to a method of operating a camera system comprising the steps of: providing a camera system having a stationary camera providing a wide angle view and a remotely controllable camera set having a relatively smaller angle view for providing images in substantially full resolution; monitoring the wide angle view of the stationary camera; selecting a desired subject within the wide angle view; generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera; controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject; processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely controllable camera; and providing calibration data that defines particular operational characteristics of the stationary and remotely controllable cameras.

Dependent Claims 9 and 10 directly or indirectly depend upon Claim 7 and further limit the scope of Claim 7.

Each of the appealed claims, mentioned supra, is set forth in the Appendix.

VIII. THE PRIOR ART RELIED UPON

The reference relied upon by the Examiner in rejecting Claims 1-5, 7, 9, and 10 is World Patent No. WO 99/455511 to Nayar et al., (hereinafter "Nayar").

IX. THE ISSUES

The issue raised in the Final Rejection dated July 8, 2003 remaining for resolution is are Claims 1-5, 7, 9, and 10 on appeal patentable, under 35 U.S.C. § 102(b), in light of Nayar.

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XI. GROUPING OF THE CLAIMS

The prior art rejections of issue herein apply to more than one claim. Despite this, Appellant submits that the rejected claims stand or fall together.

XII. APPELLANT'S ARGUMENTS

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Nayar discloses at page 11, lines 27-29 that the coordinate mapping system 70 provides appropriate pan, tilt, and zoom settings to the PTZ system 20, so that the PTZ system is directed to view the region of interest. Thus, the pan, zoom, and tilt settings are a control signal supplied to the PTZ camera to control the same to direct it to view a particular object of interest. This is in stark contrast to the calibration data as recited in claims 1 and 7.

Page 5, lines 12-17 of the present application discuss a preferred embodiment of the present invention in which the processor is programmed with software that realizes optical flow techniques that allow the camera system 10 to align the views from the stationary 12 and mechanical camera 14. In this context, the specification discusses the processor including means for receiving calibration data that defines particular operational characteristics of the camera 12, 14. Thus, the calibration data is defined in the specification and the claims as defining operational characteristics of the cameras, for example, for use in aligning the views of the

cameras using the optical flow techniques. In this context, the operational characteristics of the cameras cannot be considered the control signals for operating the cameras. The signals described in Nayar merely control the camera's motors to direct the camera accordingly; they in no way define operational characteristics of the cameras.

Furthermore, the recited portion of Sergeant et al., discloses a mechanical stop mounted in the camera itself to recognize a home position of the camera. This configuration does not disclose receiving calibration data defining operational characteristics of the camera.

Therefore, based on the above arguments and remarks, Appellants respectfully submit that the claims of the instant invention on appeal are not anticipated by Nayar. Consequently, the rejection of the claims based on the Nayar reference is in error.

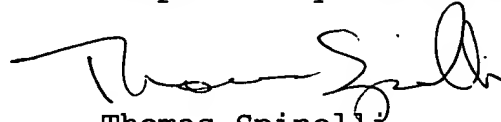
XIII. CONCLUSION

In view of the remarks submitted hereinabove, the reference applied against Claims 1-5, 7, 9, and 10 on appeal do not render those claims unpatentable under 35 U.S.C. § 102(b). Thus, Appellants submit that the § 102(b) rejection is in error and must be reversed.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment in connection

herewith to Deposit Account No. 19-1013/SSMP. A triplicate
copy of this sheet is enclosed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Spinelli', written over a horizontal line.

Thomas Spinelli
Registration. No. 39,533

SCULLY SCOTT MURPHY & PRESSER
400 Garden City Plaza
Garden City, New York 11530
(516) 742-4343
TS/cm

APPENDIX

CLAIMS ON APPEAL: CLAIMS 1-5, 7, 9 and 10
Application Serial No. 09/772,476

1. (Previously Presented) A camera system, the system comprising:

a stationary camera having a wide angle view;

a remotely controllable camera having a relatively smaller angle view for providing images in substantially full resolution; and

a processor for monitoring the wide angle view of the stationary camera, enabling selection of a desired subject within the wide angle view, generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera, controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject, and processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely controllable camera, the processor further including means for receiving calibration data that defines particular operational characteristics of the stationary and remotely controlled cameras.

2. (Original) The camera system according to claim 1 wherein the stationary camera comprises a electronic-pan-tilt-zoom camera.

3. (Original) The camera system according to claim 1 wherein the remotely controlled camera comprises a mechanical-pan-tilt-zoom camera.

4. (Original) The camera system according to claim 1 wherein the processor comprises a computer.

5. (Original) The camera system according to claim 1 further including means for displaying the substantially full resolution view of the desired subject.

6. (Canceled)

7. (Previously Presented) A method of operating a camera system, comprising the steps of:

providing a camera system having a stationary camera providing a wide angle view and a remotely controllable camera set having a relatively smaller angle view for providing images in substantially full resolution;

monitoring the wide angle view of the stationary camera;

selecting a desired subject within the wide angle view;

generating an electronic pan-tilt-zoom view of the desired subject based on the wide angle view of the stationary camera;

controlling the remotely controllable camera for providing a view that overlaps the electronic pan-tilt-zoom view of the desired subject;

processing the electronic pan-tilt-zoom view of the desired subject in accordance with the resolution of the remotely controllable camera; and

providing calibration data that defines particular operational characteristics of the stationary and remotely controllable cameras.

8. (Canceled)

9. (Original) The method according to claim 7 wherein the processing step further comprises the step of displaying the processed view of the desired subject.

10. (Original) The method according to claim 7 wherein the selecting step comprises the step of generating pixel data defining the desired subject within the wide angle view.